

OMAR KRASHNA - SB #214567
KRASHNA LAW FIRM
1440 Broadway, Suite 308
Oakland, California, 94612
Telephone: (510) 836-2999 Fax: (510) 836-2900
Email: okrashna@yahoo.com

Elaine L. Morinelli-SB #120913
Law Offices of Elaine L. Morinelli
6009 Buena Ventura Ave.
Oakland, CA 94605
Telephone: (510) 832-4221 Fax: (510) 903-1322
Email: elmlaw@sonic.net

Attorneys for Plaintiff Beverly Aldabashi

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

BEVERLY ALDABASHI, SALEH
ALDABASHI, in his own right and as
guardian ad litem on behalf of his minor
son, SALEH "JULIAN" ALDABASHI,

Plaintiffs,

v.

DOES 1 through 20, inclusive, and the
CITY OF OAKLAND, CALIFORNIA,

Defendants.

Case No. C 08-00217 JSW

**DECLARATION OF OMAR KRASHNA
RE OSC ISSUED ON 4/25/2008**

I, OMAR KRASHNA, am an attorney for Plaintiff BEVERLY ALDABASHI in the
above-entitled matter, and declare as follows:

DECLARATION

C08-00217 JSW

1 1. In my preparation for proceeding with representation of my client, in this matter,
2 I reviewed the Court's local rules and the relevant standing orders of Judge White.

3 2. Nevertheless, pursuant to local rule 16-10(a), as lead counsel for Beverly
4 Aldabashi, I erred in not seeking leave/excuse from the Court to have my co-counsel
5 appear at the initial case management conference ("CMC") in this matter.
6

7 3. On the day before the initial CMC, in haste, I assigned co-counsel, Ms.
8 Morinelli, to appear in my stead. It was my intention to appear. However, on the eve of the
9 CMC, I discovered that an ultimately dispositive motion I had pending in the Alameda
10 County Superior Court mandated my appearance the following day—April 25. The court
11 had not issued a tentative ruling on the motion. Rather, I had to appear in the presiding
12 department to argue the motion, which confirmed a final judgment in my client's favor.
13 Further, I was the only attorney in my office who had worked on the case.
14

15 4. While I would normally never prioritize a superior court matter over a matter
16 pending before this Court, the above-recited circumstances led to my inadvertence of the
17 local rule requiring my attendance. I will take more earnest measures to avoid any similar
18 circumstance throughout the further proceedings in this matter.

19 5. Finally, with regard to the parties' collective failure to comply with the Court's
20 ADR procedures, I will take initiative to confer with the other parties to assure future
21 compliance.
22

23 ///

24 ///

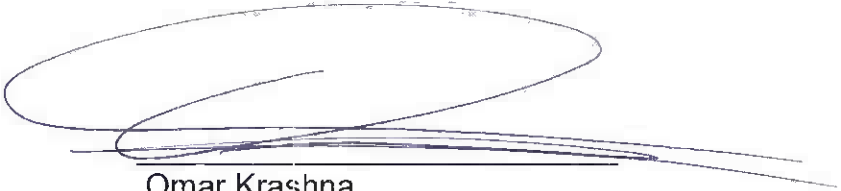
25
26
DECLARATION

C08-00217 JSW

1 I declare under penalty of perjury, that the foregoing is true and correct, except as
2 to those matters stated on information and belief, and as to those matters, I believe them
3 to be true.

4
5 Respectfully submitted,

6
7 Dated: April 30, 2008



8 Omar Krashna
9 KRASHNA LAW FIRM
10 Attorneys for Plaintiff
11 BEVERLY ALDABASHI
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

DECLARATION

C08-00217 JSW